

**Docket No. 2021-9-E**

5. On August 25, 2021, the Commission consolidated the above-referenced DESC 2021 IRP Update docket with DESC's 2020 IRP docket, Docket No. 2019-226-E.

6. DESC's 2020 Modified IRP was filed in Docket No. 2019-226-E on February 19, 2021. On June 18, 2021, the Commission issued Order No. 2021-429, which approved DESC's Modified 2020 IRP but required the Company to include certain information in its 2021 IRP Update.

7. Petitioner Johnson Development intervened and participated in in DESC's 2020 IRP proceeding (Docket No. 2019-226-E) and have continued to participate in the docket. Though Johnson Development appears to be recognized as an intervenor already in the subject matter by virtue of consolidation with Docket No. 2019-226-E, Johnson Development in an abundance of caution renews and restate its interest in intervening.

8. The Act (H.3659), S.C. Code § 58-37-40, passed in 2019, provides for Commission review of each utility's IRP and set forth new IRP requirements. Intervention and discovery are expressly provided under the Act in order to assist parties in obtaining evidence concerning the IRP, including the reasonableness and prudence of the plan and alternatives to the plan raised by intervening parties.

9. Petitioner seeks to intervene in this docket to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources.

10. JDA is a South Carolina Corporation, founded in 1986 and headquartered at 100 Dunbar Street, Spartanburg, South Carolina, 29306. JDA is a multi-division developer of industrial, multi-family, self-storage, renewable energy, and commercial projects.

11. JDA has a direct and substantial interest in the outcome of this proceeding, and will be directly affected by the discussion and resolution of the topics covered therein. JDA's

position and market presence relates directly to the details of this proceeding concerning DESC. JDA has or may have qualifying facilities under development or positioned in DESC's interconnection queue that will be impacted by the decisions this Commission makes regarding the implementation of DESC's IRP updates, other decisions made pursuant to S.C. Code § 58-41-30, and conditions this Commission finds necessary to implement the provisions of the Act. JDA has a substantial and specific economic interest in the implementation of the Act as it relates to supplying renewable energy to commercial and industrial customers as JDA currently develops renewable energy projects in South Carolina. JDA's interest in this proceeding cannot be adequately represented or protected by any other party.

12. Pursuant to S.C. Code of Regs. 103-804(T), JDA is represented by the following counsel in this proceeding:

Weston Adams, III (SC Bar No. 64291)  
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WHEREFORE, Petitioner prays that it be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 2nd day of September, 2021.

<signature page follows>

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2nd day of September, 2021  
Columbia, South Carolina

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Docket No. 2021-9-E**

In re: )  
 Dominion Energy South Carolina, )  
 Incorporated's 2021 Integrated )  
 Resource Plan (IRP) (See also Docket )  
 No. 2019-226-E )  
 )  
 )

**CERTIFICATE OF SERVICE  
 OF JOHNSON DEVELOPMENT  
 ASSOCIATES, INC.**

This is to certify that I have caused to be served this day one copy of **Motion to Intervene** to the persons named below at the addresses set forth via electronic mail and via e-filing:

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/s/ Courtney E. Walsh  
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Columbia, SC  
September 2, 2021